IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

**CHARLESTON DIVISION** 

IN RE: Ethicon Inc., Pelvic Repair System

**Products Liability Litigation** 

**MDL NO. 2327** 

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED

**EXHIBIT:** 

JOINT MOTION TO DISMISS DEFENDANT BOSTON SCIENTIFIC CORP. WITH PREJUDICE

Plaintiffs in this case (listed on the attached Exhibit A) and defendant Boston Scientific

Corporation ("BSC") advise the Court that they have compromised and settled all claims between

them in this action, including all counterclaims, cross-claims and third-party claims. Accordingly,

Plaintiff and BSC jointly move the Court to dismiss BSC as a defendant in this action with

prejudice and terminate BSC from the docket of the Court in this action, each party to bear its own

costs.

Dated: March 19, 2018

Respectfully submitted,

By: /s/ Melanie H. Muhlstock

Melanie H. Muhlstock Parker Waichman LLP

6 Harbor Park Drive

Port Washington, NY 11050

Telephone: 516.466.6500 Facsimile: 516.466.6665

mmuhlstock@yourlaywar

mmuhlstock@yourlaywer.com

**COUNSEL FOR PLAINTIFFS** 

By: /s/ Jon A. Strongman

Robert T. Adams – MO Bar #: 34612

8560847 v1

Jon A. Strongman – MO Bar #: 53995 SHOOK, HARDY & BACON L.L.P. 2555 Grand Boulevard Kansas City, Missouri 64108 Telephone: 816.474.6550 Facsimile: 816.421.5547 rtadams@shb.com jstrongman@shb.com

COUNSEL FOR DEFENDANT BOSTON SCIENTIFIC CORP.

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 2018 I electronically filed the foregoing with the Clerk using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in the member cases.

By: /s/ Melanie H. Muhlstock
Melanie H. Muhlstock
Parker Waichman LLP
6 Harbor Park Drive
Port Washington, NY 11050
Telephone: 516.466.6500
Facsimile: 516.466.6665
mmuhlstock@yourlaywer.com

## **COUNSEL FOR PLAINTIFFS**

By: /s/ Jon A. Strongman Robert T. Adams – MO Bar #: 34612 Jon A. Strongman – MO Bar #: 53995 SHOOK, HARDY & BACON L.L.P.

COUNSEL FOR DEFENDANT BOSTON SCIENTIFIC CORPORATION

## **EXHIBIT A**

CASE NUMBER	CASE NAME
13-cv-03072	Jenny Frost et al
12-cv-03675	Karen Fuller et al
12-cv-03156	Rebecca Johnson et al
15-cv-02080	Irene Martoni et al
14-cv-18419	Ruthie Rojas
13-cv-19268	Rebecca Schulman
13-cv-10341	Catherine Kemp et al
15-cv-07251	Rita LaMountain